

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CBIZ, INC., *et al.*, ) CASE NO. 1:24-cv-01027-JPC  
Plaintiffs, )  
v. ) JUDGE J. PHILIP CALABRESE  
GREGORY J. CRYAN, *et al.*, )  
Defendants. )  
 ) MAGISTRATE JUDGE JONATHAN D.  
 ) GREENBERG  
 )  
 ) PLAINTIFFS' MOTION FOR SUMMARY  
 ) JUDGMENT AS TO DEFENDANTS'  
 ) COUNTERCLAIM/THIRD-PARTY  
 ) COMPLAINT AND CONSOLIDATED  
 ) CLAIMS ORIGINALLY FILED IN  
 ) GEORGIA STATE COURT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiffs CBIZ, Inc., CBIZ Insurance Services, Inc., and Third-Party Defendant Mike Gill (collectively “CBIZ”) respectfully move the Court to grant CBIZ summary judgment on all claims raised in Defendants’ Counterclaim/Third-Party Complaint and all claims raised by Defendants’ Consolidated Complaint (See ECF No. 11-1 in Case No. 1:24-cv-1350) because there are no genuine issues of material fact and CBIZ is entitled to judgment as a matter of law. The reasons supporting this motion are set forth in the attached Memorandum of Law.

Respectfully submitted,

/s/ Lawrence D. Pollack

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*Attorneys for Plaintiffs CBIZ, Inc., CBIZ Benefits & Insurance Services, Inc., CBIZ Insurance Services, Inc., and Third-Party Defendant Mike Gill*

**CERTIFICATE OF SERVICE**

I certify that on April 7, 2025, a copy of *Plaintiffs' Motion for Summary Judgment as to Defendants' Counterclaim/Third-Party Complaint and Consolidated Claims Originally Filed in Georgia State Court* was electronically filed via the Court's CM/ECF system. Notice and a copy of this filing will be sent to counsel of record for all parties via the Court's CM/ECF system.

/s/ Lawrence D. Pollack  
One of the attorneys for Plaintiffs CBIZ, Inc.,  
CBIZ Benefits & Insurance Services, Inc., and  
CBIZ Insurance Services, Inc., and Third-  
Party Defendant Mike Gill.